



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 2, 2021

By ECF

MEMORANDUM ENDORSEMENT

Hon. Gabriel W. Gorenstein
United States Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Molina v. Comm'r of Soc. Sec.*, No. 20 Civ. 5946 (VSB) (GWG)

Dear Judge Gorenstein:

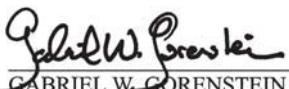
This Office represents the Commissioner of Social Security (the “Commissioner”), the defendant in the above-referenced action brought pursuant to **42 U.S.C. § 405(g)**, in which the plaintiff appeals the Commissioner’s decision to deny her application for Social Security disability benefits.

I respectfully write to request, with the plaintiff’s consent, a 30-day extension of time for the Commissioner to file a cross-motion for judgment on the pleadings, *nunc pro tunc*, from March 25, 2021, to April 26, 2021, as well as corresponding extensions of time for the plaintiff to file any reply until May 17, 2021, and for the Commissioner to file any reply by June 1, 2021. The extension is needed because I have determined that additional discussion with the agency is needed to determine the Commissioner’s litigation position in this case. I apologize for the delay in seeking this extension, but the extension would allow time for further internal review by the agency and potentially avoid unnecessary motion practice if the parties are able to resolve this case through a stipulation.

The plaintiff consents to this request for an extension, and this is the Commissioner’s first request for an extension in this case. I thank the Court for its consideration of this request.

The proposed schedule is approved.

So Ordered.



GABRIEL W. GORENSTEIN
United States Magistrate Judge
April 5, 2021

Respectfully,

AUDREY STRAUSS
United States Attorney

/s/ Amanda F. Parsels

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